

NOVEMBER 13, 2023

MICHAEL ELSTRO

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UNITED STATES DISTRICT COURT	1	A P P E A R A N C E S
FOR THE SOUTHERN DISTRICT OF NEW YORK	2	ON BEHALF OF THE PLAINTIFF KITCHEN WINNERS AND
- - - - - x	3	THIRD-PARTY DEFENDANTS ADORAMA INC., HERSHEY
KITCHEN WINNERS NY INC., : PLAINTIFF, : v. : CIVIL ACTION	4	WEINER, AND JOSEPH MENDLOWITZ (VIA ZOOM):
ROCK FINTEK LLC, : NO.	5	ALEXANDER SPERBER, ESQUIRE
DEFENDANT. : 22-cv-05276-PAE	6	KIPSIUS BENHAIM LAW
ROCK FINTEK LLC, COUNTERCLAIM AND THIRD-PARTY PLAINTIFF,	7	80-02 KEW GARDENS ROAD, SUITE 1030
v. KITCHEN WINNERS NY INC, COUNTERCLAIM DEFENDANT and ADORAMA INC., HERSHEY WEINER, JOSEPH MENDLOWITZ, JNS CAPITAL HOLDINGS LLC AND JOEL STERN, THIRD-PARTY DEFENDANTS.	8	KEW GARDENS, NEW YORK 11415
- - - - - x REMOTELY CONDUCTED DEPOSITION OF MICHAEL ELSTRO MONDAY, NOVEMBER 13, 2023 9:06 A.M. CST	9	212-981-8440
REPORTED BY: KARISA EKENSEAIR, MO CCR RMR #1507	10	ASPERBER@LIPSIUSLAW.COM
	11	
	12	ON BEHALF OF THE DEFENDANT ROCK FINTEK LLC (VIA
	13	ZOOM):
	14	PHILLIP RAKHUNOV, ESQUIRE
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	21	
	22	
	23	
	24	
	25	
		Page 4
1 DEPOSITION OF MICHAEL ELSTRO, CONDUCTED VIA	1	A P P E A R A N C E S C O N T I N U E D
2 ZOOM VIDEOCONFERENCE WITH THE WITNESS LOCATED IN	2	ON BEHALF OF THIRD-PARTY DEFENDANTS JNS CAPITAL
3 MISSOURI.	3	LLC AND JOEL STERN (VIA ZOOM):
4	4	AVRAM FRISCH, ESQUIRE
5	5	THE LAW OFFICE OF AVRAM E. FRISCH LLC
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10	10	
11 Pursuant to notice, before Karisa J.	11	ON BEHALF OF THE RESOURCE GROUP AND THE
12 Ekenseair, Certified Shorthand Reporter in and for	12	DEPONENT (VIA ZOOM):
13 the State Missouri; National Registered	13	TAYLOR MATTHEWS, ESQUIRE
14 Professional Reporter; National Registered Merit	14	LEWIS RICE LLC
15 Reporter; Notary Public in and for the State of	15	600 WASHINGTON AVENUE, SUITE 2500
16 Arkansas.	16	ST. LOUIS, MISSOURI 63101
17	17	314-444-7600
18	18	TMATTHEWS@LEWISRICE.COM
19	19	
20	20	ALSO PRESENT:
21	21	THOMAS KATO
22	22	HERSHEY WEINER
23	23	SEPIDEH KHANSARI, THE RESOURCE GROUP
24	24	
25	25	

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T A B L E O F C O N T E N T S			Page 5	Page 7
		PAGE		
3	STYLE AND NUMBER.....	1	1	PROCEEDINGS
4	APPEARANCES.....	3	2	MIKE ELSTRO
5			3	of lawful age, being first duly sworn, deposes and
6	WITNESS: MIKE ELSTRO		4	says in reply to the questions propounded as
7	EXAMINATION BY MR. FRISCH.....	7	5	follows:
8	EXAMINATION BY MR. SPERBER.....	56	6	EXAMINATION
9	EXAMINATION BY MR. RAKHUNOV.....	63	7	BY MR. FRISCH:
10	CERTIFICATE OF REPORTER.....	68	8	Q Good morning, sir. My name is Avram
11			9	Frisch. I'm the attorney for third-party
12			10	defendants Joel Stern and JNS Capital Holdings
13			11	LLC. And I'm going to be asking you questions
14			12	here today regarding the litigation between Rock
15			13	Fintek LLC, my clients, and the clients of
16			14	Mr. Sperber who is the plaintiff in this action,
17			15	and some of the other third-party defendants.
18			16	Can you state your name and address for
19			17	the record, please? Your business address is
20			18	fine.
21			19	A Yes. My name is Michael Elstro. My
22			20	business address would be 2554 West Port Center
23			21	Drive, St. Louis, Missouri.
24			22	Q Thank you. Have you ever testified at a
25			23	deposition before?
			24	A No, sir. I have not.
			25	Q All right. So let me explain to what you
				Page 6
				Page 8
1			1	this is about.
2			2	During the course of the deposition, I and
3			3	my colleagues in the case will be asking you
4			4	questions about issues in the case. We've
5			5	negotiated with your counsel to limit the issues
6			6	to specific items, which I'm sure he'll remind me
7			7	when I stray beyond that.
8			8	You're answering under oath, as you know.
9			9	And you know, this is to be treated as the same as
10			10	if you were in a courtroom, right. Tell the truth
11			11	and, you know, and you cannot discuss the
12			12	questions and answers directly with your counsel
13			13	as they're ongoing.
14			14	If you need a break, please let me know.
15			15	As long as no question is pending, we'll be happy
16			16	to take a break whenever you need it.
17			17	If you don't understand a question, please
18			18	let me know and I'll repeat it or rephrase it.
19			19	Please speak your answers aloud so that the
20			20	stenographer can record all of your responses.
21			21	Please also don't do uh-huhhs, yes, no, head -- not
22			22	yes -- I mean, uh-huh, yeah, something like that.
23			23	Use full words and no head nods so that the court
24			24	reporter can take it down.
25			25	Other than with your attorney, have you

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<p>1 put the gloves so that would have been at least a 2 way to use them up?</p> <p>3 MR. MATTHEWS: Object to the form; beyond 4 the scope of the deposition topics.</p> <p>5 But you may answer, if you know.</p> <p>6 THE WITNESS: So healthcare providers 7 depend upon PPE, right. It is their livelihood, 8 right, to protect them from bodily fluids, waste. 9 And when that comes into question, we can't take 10 that risk. You're putting people's lives at 11 potential risk by utilizing product that is 12 counterfeit and ineffective.</p> <p>13 BY MR. FRISCH:</p> <p>14 Q Well, let's ask that: What makes you say 15 that the gloves were counterfeit?</p> <p>16 A I would say that the gloves were 17 counterfeit because they did not meet the 18 specifications and representations that The 19 Resource Group was provided. It clear articulates 20 on our purchase orders that the gloves should be 21 ASTM D6319-rated, that they should be nitrile 22 gloves, they should be FDA approved.</p> <p>23 And based upon the representations that 24 were provided to us from Rock Fintek and had 25 Kitchen Winners name on it, I mean, the boxes</p>	<p>Page 25</p> <p>1 MR. RAKHUNOV: Yeah. Note my objection to 2 form as well.</p> <p>3 THE WITNESS: The Resource Group and 4 Ascension don't care what the contract says 5 between Rock Fintek and Kitchen Winners or JNS 6 Capital. Our contract stated that there should be 7 ASTM D6319-rated nitrile gloves, FDA approved, and 8 the gloves are not.</p> <p>9 BY MR. FRISCH:</p> <p>10 Q Did you -- were you ever in communication 11 with Medcare directly?</p> <p>12 A I was part of one conference call with 13 individuals that were, I'm told, part of Medcare. 14 I've met them one time on a conference call.</p> <p>15 Q Because you said they were counterfeit 16 gloves, do you have any reason to believe that 17 these gloves were not shipped by Medcare and not 18 manufactured by Medcare?</p> <p>19 MR. MATTHEWS: Object to form; beyond the 20 scope of the topics.</p> <p>21 But you may answer, if you know.</p> <p>22 THE WITNESS: I can't speculate on that.</p> <p>23 BY MR. FRISCH:</p> <p>24 Q Were there any gloves that were good 25 in -- in the 200 million gloves, did you figure</p>
<p>1 state -- even the outside of the boxes state 2 nitrile on them, the outer box and the inner box, 3 and that is not the case.</p> <p>4 Q Well, you -- you had two boxes examined, 5 right, for whether or not they were nitrile; isn't 6 that correct?</p> <p>7 MR. RAKHUNOV: Avi, I'm sorry, can you 8 just please speak up a little? You trail off at 9 the end of your question.</p> <p>10 BY MR. FRISCH:</p> <p>11 Q I said you had two boxes examined to 12 determine if they were nitrile; is that correct?</p> <p>13 A So that's not what I said. I said the 14 gloves were not ASTM D6319-rated. The gloves did 15 not pass elongation and tensile testing. 16 Therefore, they're not -- they did not meet the 17 requirement to be an ASTM D6319 nitrile glove.</p> <p>18 Q Would it surprise you to learn that the 19 contract between Rock Fintek and JNS and Joel 20 Stern did not -- did not reference ASTM D6319?</p> <p>21 MR. MATTHEWS: I'm going to object to the 22 form. I'm going to object that it's beyond the 23 scope of the deposition topics. And I will object 24 based upon foundation, or lack thereof.</p> <p>25 Subject to that, you may answer, Mike.</p>	<p>Page 26</p> <p>1 out if there was any that were usable?</p> <p>2 A I don't know if any of the gloves were 3 good. What I do know is that we cannot trust that 4 the 200 million gloves or 196 million that we 5 received some are good and some are not. We can't 6 put that on a healthcare provider to send gloves 7 in and say open the box and see if you think these 8 are good enough. They don't have time to do that.</p> <p>9 If you're ever in a healthcare setting, 10 folks are running to grab gloves sometimes to take 11 care of their patients. We cannot put that burden 12 on healthcare providers.</p> <p>13 Q Once you discovered the issues with the 14 gloves, did you request that Rock Fintek give you 15 a replacement?</p> <p>16 A The Resource Group has asked that Rock 17 Fintek make us whole on the situation. I believe 18 there's a Lewis & Rice letter that was sent to 19 Rock Fintek in March of 2022 that lays out our 20 requests or demands of Rock Fintek, that we be 21 made whole on the order that was received, so the 22 196 million gloves, close to \$37 million; not to 23 mention the fact that we have well north of 24 \$2 million in holding costs for these gloves at 25 this point in time and that continues to grow, and</p>

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<p>1 other damages.</p> <p>2 Q And what was their response to that?</p> <p>3 A I do not know.</p> <p>4 Q I'm going to call up the letter. Did it</p> <p>5 pop up? That was labeled at, I think, Mr. Kato's</p> <p>6 deposition as JNS A -- Exhibit A.</p> <p>7 Is this the letter you were referring to?</p> <p>8 MR. MATTHEWS: Mike, are you able to click</p> <p>9 through it?</p> <p>10 THE WITNESS. Yes, sir.</p> <p>11 That looks like the letter. I'm just --</p> <p>12 sorry, I'm just trying to make -- blow it up and</p> <p>13 just make sure that --</p> <p>14 BY MR. FRISCH:</p> <p>15 Q You can -- you can control --</p> <p>16 A Yes.</p> <p>17 Q -- the size and the scrolling --</p> <p>18 A Yes.</p> <p>19 Q -- on your own screen.</p> <p>20 A Yep. Yes, sir. I understand.</p> <p>21 Yes. That is the letter.</p> <p>22 Q Do you happen to know why your attorney</p> <p>23 believed that Rock Fintek LLC was not formed until</p> <p>24 May 1st, 2021?</p> <p>25 MR. MATTHEWS: Object to form; and calls</p>	Page 29	<p>1 Medcare gloves?</p> <p>2 A I don't recall specifically. Although, I</p> <p>3 do recall we had -- we had multiple conversations</p> <p>4 with Rock Fintek when they thought that they had</p> <p>5 found a provider that could fulfill the order, but</p> <p>6 I don't recall all those different brands of</p> <p>7 gloves.</p> <p>8 Q Okay. What -- when you first discovered</p> <p>9 the gloves were bad, did -- when did you first ask</p> <p>10 Rock Fintek to replace the gloves or to make you</p> <p>11 whole?</p> <p>12 A We brought it to their attention in July</p> <p>13 of '21, that the gloves were bad and we needed to</p> <p>14 find resolution and find replacement gloves.</p> <p>15 Q And what was -- what was their response in</p> <p>16 July of 2021?</p> <p>17 MR. RAKHUNOV: Objection. Go ahead.</p> <p>18 THE WITNESS: We had -- we had multiple</p> <p>19 conversations with Rock Fintek. I think at first</p> <p>20 they believed that we had received good gloves.</p> <p>21 But as time went on in the conversation and they</p> <p>22 went out and they started looking at the gloves at</p> <p>23 the Medline warehouses, they understood that we</p> <p>24 had a situation on our hands.</p> <p>25 BY MR. FRISCH:</p>	Page 31
<p>1 for a disclosure of attorney-client</p> <p>2 communications.</p> <p>3 So I will instruct the witness not to</p> <p>4 answer as to what his knowledge of his attorney's</p> <p>5 belief is.</p> <p>6 MR. FRISCH: Okay. Let me rephrase that</p> <p>7 without reference.</p> <p>8 BY MR. FRISCH:</p> <p>9 Q Do you know, without reference to any</p> <p>10 conversations with any of your attorneys, if Rock</p> <p>11 Fintek LLC was not formed until May 1st, 2021?</p> <p>12 A I'm sorry, can you repeat the last part of</p> <p>13 your question? You've asked -- I'm having issues</p> <p>14 hearing you at the end.</p> <p>15 Q Sorry. I'll get a little closer to the</p> <p>16 screen.</p> <p>17 Do you know, without reference to</p> <p>18 conversations with your attorneys which I don't</p> <p>19 want to know about, do you know if Rock Fintek LLC</p> <p>20 was only formed on May 1, 2021, as noted in the</p> <p>21 footnote in this letter?</p> <p>22 A I'm not aware.</p> <p>23 Q Okay. Did Rock Fintek ever offer you</p> <p>24 another brand of gloves during the period, let's</p> <p>25 say around April 2021, in -- in lieu of the</p>	Page 30	<p>1 Another document, this had also previously</p> <p>2 been marked at Mr. Kato's deposition as JNS</p> <p>3 Exhibit F.</p> <p>4 And here, Mr. Kato writes -- I'm trying to</p> <p>5 find the line I want you to look at. In -- if</p> <p>6 you -- well, just read through this -- this</p> <p>7 e-mail. I know you're not copied on it, but maybe</p> <p>8 you're familiar with it anyway.</p> <p>9 Just read through it quickly and then I'll</p> <p>10 ask my question.</p> <p>11 A Okay. Please give me just a couple of</p> <p>12 minutes.</p> <p>13 (Off-the-record discussion.)</p> <p>14 MR. FRISCH: All right. Are we back on</p> <p>15 the record?</p> <p>16 BY MR. FRISCH:</p> <p>17 Q Michael, you ready? You read it or</p> <p>18 you still --</p> <p>19 A I did. I was having problems trying to</p> <p>20 read it when you guys were talking --</p> <p>21 Q Oh, sorry --</p> <p>22 A -- so if you guys can give me a couple</p> <p>23 minutes of silence --</p> <p>24 Q Sure.</p> <p>25 A -- I'd appreciate it. Thank you.</p>	Page 32

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<p>1 THE REPORTER: Would we like to go off the 2 record?</p> <p>3 MR. RAKHUNOV: Yeah. Let's go off the 4 record for two minutes.</p> <p>5 (Whereupon a break was had.)</p> <p>6 BY MR. FRISCH:</p> <p>7 Q Have you ever seen this document before?</p> <p>8 A No, sir. I have not.</p> <p>9 Q In the middle, it says in -- later in 10 February and March, we were able to secure 11 pre-pandemic brand gloves like Kimberly Clark, 12 Intco, and others. These name brands would have 13 cost us less to purchase but we did not. Vince 14 told us not to. He said Medcare gloves are in all 15 the hospitals and they are very happy with them 16 and it's more work to input a new product.</p> <p>17 Were you aware of this conversation that 18 Mr. Kato says occurred?</p> <p>19 MR. MATTHEWS: Objection to the form; 20 beyond the scope of the deposition notice.</p> <p>21 But you may answer, if you know.</p> <p>22 THE WITNESS: I'm not aware of that.</p> <p>23 BY MR. FRISCH:</p> <p>24 Q Are you aware of any -- if I told you 25 Vince said this, is that -- would that have</p>	<p>Page 33</p> <p>1 the scope of the deposition notice. 2 But subject to that, you may answer, if 3 you know.</p> <p>4 THE WITNESS: Unfortunately, I don't 5 remember the cost of every glove that we purchased 6 during COVID-19. As I stated, they were -- they 7 were ranging from 15 to \$0.20 a glove.</p> <p>8 BY MR. FRISCH:</p> <p>9 Q Did Rock Fintek ever replace a single 10 glove?</p> <p>11 A To my knowledge, Rock Fintek has not 12 replaced any of the 196 million-ish gloves that 13 we -- we, The Resource Group, have received.</p> <p>14 Q Did Rock Fintek refund any money?</p> <p>15 A To my knowledge, we have not received any 16 reimbursement refunds of the close to \$37 million 17 plus the holding costs and other damages as part 18 of this.</p> <p>19 Q Did Rock Fintek do anything to make the 20 situation better on your end?</p> <p>21 MR. RAKHUNOV: Objection.</p> <p>22 THE WITNESS: The situation is unresolved 23 on our end. We still have purchased 196 million 24 gloves, close to \$37 million, holding costs, and 25 other damages. And we have not recouped any of</p>
<p>1 been -- strike that.</p> <p>2 I guess, just to be clear, are you -- do 3 you think there's any truth to Mr. Kato's 4 statement here?</p> <p>5 MR. MATTHEWS: Object to the form; beyond 6 the scope of the deposition notice; calls for 7 speculation.</p> <p>8 Subject to that, you may answer.</p> <p>9 MR. RAKHUNOV: Objection.</p> <p>10 THE WITNESS: We bought -- we bought 11 gloves from the other providers listed. And when 12 I say from them, not from them, but from middle -- 13 middlemen, right, that were selling those gloves. 14 We had Kimberly Clark, Intco. We had multiple 15 brands of gloves we purchased during COVID-19.</p> <p>16 And I can tell you the going rate for 17 gloves was very high. We buy gloves 18 two-and-a-half, \$0.03 a day. Gloves were going 19 for 15 to close to \$0.20 a glove during COVID-19.</p> <p>20 BY MR. FRISCH:</p> <p>21 Q Do you happen to recall if Kimberly Clark 22 gloves were more or less expensive than the 23 Medcare gloves you brought from Rock Fintek at 24 that point in time?</p> <p>25 MR. MATTHEWS: Object to the form; beyond</p>	<p>Page 34</p> <p>1 that today.</p> <p>2 BY MR. FRISCH:</p> <p>3 Q And you testified you're still holding 4 them at the Medline distribution center?</p> <p>5 MR. MATTHEWS: Object to the form. That's 6 beyond the scope of this deposition notice.</p> <p>7 Subject to that, if you have personal 8 knowledge, you may answer.</p> <p>9 THE WITNESS: I'm not -- so my day-to-day 10 role, I'm not directly tied into, like, the 11 holding of the gloves and distributing them. I do 12 know that Ascension, so the parent organization of 13 The Resource Group, has donated a good number of 14 the gloves, but we are still holding a substantial 15 amount, over half of the order, at Medline 16 distribution centers.</p> <p>17 BY MR. FRISCH:</p> <p>18 Q Do you know how much you paid Rock Fintek 19 in total for the Medcare gloves?</p> <p>20 A It was -- we paid Rock Fintek what we had 21 been invoiced for, so it was close to 100 -- 196 22 million at the 18-and-a-half cents per glove. 23 They invoiced us -- every time that we received an 24 order, Medline checked it, sent us a notice it was 25 received. Rock Fintek would send us an individual</p>

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<p>1 invoice and we would pay it.</p> <p>2 Q But you're not aware of the total sitting</p> <p>3 here today?</p> <p>4 A I don't know the exact total. As I said,</p> <p>5 it's close to \$37 million.</p> <p>6 Q What -- had these gloves be acceptable,</p> <p>7 what is the likelihood that Rock Fintek would have</p> <p>8 gotten another contract from The Resource Group?</p> <p>9 A I -- so I'll -- I'll answer, but it's kind</p> <p>10 of speculative at this point in time, like, what</p> <p>11 it would have been. And I'll address it from two</p> <p>12 different angles. So I'll approach it from a</p> <p>13 short-term and long-term perspective.</p> <p>14 So short term, while we were in the midst</p> <p>15 of COVID-19, I think it's highly likely that we</p> <p>16 would have continued to engage with Rock Fintek in</p> <p>17 additional business opportunities. There were</p> <p>18 other needs that came up. It was like playing</p> <p>19 Whac-A-Mole, right. You didn't know day-to-day,</p> <p>20 week-to-week, what our medical supply needs would</p> <p>21 be.</p> <p>22 So you know, it was gloves when we made</p> <p>23 the glove purchase. But, you know, there was a</p> <p>24 run where people were having issues getting bent</p> <p>25 metal, things like wheelchairs and walkers,</p>	<p>Page 37</p> <p>1 Medline, that we continued to buy during COVID-19</p> <p>2 and we continue today.</p> <p>3 BY MR. FRISCH:</p> <p>4 Q Was there any effort -- was there ever a</p> <p>5 time where somebody would have told Thomas Kato</p> <p>6 that he would have the ability to bid for a</p> <p>7 contract for gloves in the future?</p> <p>8 MR. MATTHEWS: Avi, can you repeat that?</p> <p>9 I'm sorry, we're having a hard time listening --</p> <p>10 MR. FRISCH: Sorry. Every time I sit</p> <p>11 back, it's a little bit --</p> <p>12 MR. MATTHEWS: That's okay.</p> <p>13 MR. FRISCH: Sorry about that.</p> <p>14 BY MR. FRISCH:</p> <p>15 Q Was there ever a time where Mr. Kato would</p> <p>16 have told by somebody at The Resource Group to</p> <p>17 your knowledge that he was able to bid on a</p> <p>18 contract for gloves going forward?</p> <p>19 A So I talked about the short-term potential</p> <p>20 business earlier. The long-term potential</p> <p>21 business was a conversation that Rock Fintek had</p> <p>22 brought forward to The Resource Group. Obviously,</p> <p>23 they wanted to continue a business relationship,</p> <p>24 potentially get into the medical supplies</p> <p>25 business.</p>
<p>1 crutches and canes, right.</p> <p>2 We reached out to the suppliers that we</p> <p>3 had been dealing with during COVID-19 and said,</p> <p>4 can you source any of these. So an opportunity</p> <p>5 like that is something like Rock Fintek would have</p> <p>6 missed out upon. Because once we received the</p> <p>7 counterfeit gloves, we did not reach out to them</p> <p>8 to do any more additional business.</p> <p>9 Q Okay. Was there any -- who was your --</p> <p>10 your regular provider of gloves prior to the</p> <p>11 pandemic?</p> <p>12 MR. MATTHEWS: Object to form; beyond the</p> <p>13 scope of the deposition notice.</p> <p>14 Subject to that, you may answer, if you</p> <p>15 know.</p> <p>16 THE WITNESS: So prior to COVID-19, we</p> <p>17 were utilizing Medline for the vast majority of</p> <p>18 our nitrile exam gloves business.</p> <p>19 BY MR. FRISCH:</p> <p>20 Q And have you returned to Medline at this</p> <p>21 point in time?</p> <p>22 MR. MATTHEWS: Object to the form; beyond</p> <p>23 the scope of the notice.</p> <p>24 But subject to that, you may answer.</p> <p>25 THE WITNESS: I'd state that we never left</p>	<p>Page 38</p> <p>1 I don't recall directly having those</p> <p>2 conversations with Tommy Kato or -- or Brad, but I</p> <p>3 can tell you that I know Todd Adams who was at the</p> <p>4 time our chief operating officer and Dewayne Rader</p> <p>5 who is our vice president for -- for supply chain,</p> <p>6 both individuals had conversations with Tommy and</p> <p>7 they -- and told me that they had conversations</p> <p>8 with Tommy about that.</p> <p>9 The conversations really were around the</p> <p>10 fact of if they would -- they need to clear some</p> <p>11 major hurdles to do that, we would have</p> <p>12 discussions with them, just like we would other</p> <p>13 suppliers. But to get into that medical space,</p> <p>14 supply space, Todd and Dwayne let Rock Fintek</p> <p>15 know, one, you've got to go through all the FDA</p> <p>16 approvals, right. And that is no small hurdle.</p> <p>17 And two, you're also dealing with -- when</p> <p>18 you talk about gloves and PPE and masks, you're</p> <p>19 talking about some ginormous companies and</p> <p>20 organizations that they would have to get very</p> <p>21 competitive on price.</p> <p>22 So there were a couple of big hurdles</p> <p>23 there, but if they were willing to clear those,</p> <p>24 then we would certainly talk to them. But they</p> <p>25 would have to look at winning the business. It</p>